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Counsel for Microsoft Corporation

[Additional Counsel Identified on Signature Page]

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MICROSOFT CORPORATION and
 ACTIVISION BLIZZARD, INC.,

Defendants.

Case No. 3:23-cv-02880-JSC

ADMINISTRATIVE MOTION SEEKING *IN CAMERA* TREATMENT OF CERTAIN EXHIBITS PURSUANT TO CIVIL L.R. 7-11 AND 79-5

Date: TBA
 Time: TBA
 Dept.: Courtroom 8—19th Floor
 Judge: Honorable Jacqueline S. Corley

1 Pursuant to Civil Local Rules 7-11 and 79-5 and the June 14th Order Re: Evidentiary Hearing on
2 Preliminary Injunction Motion (ECF No. 76) (“Order”), Defendant Microsoft Corporation (“Microsoft”)
3 respectfully moves this Court to seal from public disclosure, permit *in camera* treatment, and close the
4 courtroom for the presentation of certain exhibits that appear on Plaintiff Federal Trade Commission
5 (“FTC”) and Defendants’ (collectively, the “Parties”) exhibit lists, filed today, June 20, 2023.

6 On June 14, 2023, the Court issued an Order directing the Parties, among other things, to identify
7 “each exhibit each party intends to offer at the evidentiary hearing either through a witness declaration
8 or live testimony,” including “which exhibits are subject to a confidentiality designation and where on
9 the docket the Court can locate a declaration in support of sealing as required by Local Rule 79-5.”
10 Order, at Section A.2. On June 19, 2023, the Parties exchanged their respective exhibit lists, which
11 identify exhibits that the Parties plan to introduce during the evidentiary hearing. Some of these exhibits
12 reveal highly sensitive and proprietary business information that could be used to injure Microsoft if
13 made publicly available. In compliance with the Order, given that Microsoft has not previously moved
14 to seal many of these exhibits, Microsoft hereby files this Motion in connection with the FTC and
15 Defendants’ exhibit lists to provide the Court with the requested “support of sealing as required by Local
16 Rule 79-5.” *Id.*

17 Below, Microsoft has identified highly confidential material found in the exhibits mentioned in
18 the Parties’ exhibit lists, along with the specific bases for sealing required under Local Rule 79-5. The
19 proposed sealing reflects Microsoft’s good-faith efforts to narrowly seek sealing of only that information
20 which is competitively sensitive and contained in internal documents, the public disclosure of which
21 would cause injury to Microsoft that cannot be avoided through any more restrictive alternative means:
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Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
FTC's Exhibit List and Defendants' Exhibit List			
PX1442	FTC's Exhibit List and Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities which could be used to injure Microsoft if made publicly available.
PX1823	FTC's Exhibit List and Defendants' Exhibit	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.
PX1102	FTC's Exhibit List and Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4352	FTC's Exhibit List and Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

¹ Legitimate private interests warrant *in camera* treatment of Microsoft information in this chart, and the unsealing of the information would result in injury to Microsoft that cannot be avoided through any less restrictive alternative to sealing the courtroom.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1159/PX1217	FTC's Exhibit List and Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, revenue figures and projections, and investment decisions, which could be used to injure Microsoft if made publicly available.
FTC's Exhibit List			
PX1063	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX4484	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1782	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1779	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1784	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1089	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1951	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1074	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1075	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1742	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4361	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1070	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4622	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX4347	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1571	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making process, which could be used to injure Microsoft if made publicly available.
PX1721	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4301	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1116	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.
PX4303	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1136	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.
PX4007	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1891	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

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PX1639	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1635	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and assessments of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX1465	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1145	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1023	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

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PX1024	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and investment decisions, which could be used to injure Microsoft if made publicly available.
PX4617	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4430	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX4358	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4359	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

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PX4312	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4362	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4319	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1393	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and internal decision-making processes which could be used to injure Microsoft if made publicly available.
PX1884	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

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PX4377	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, internal decision-making processes, and business partnerships, which could be used to injure Microsoft if made publicly available.
PX1883	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1494	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1110	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX4378	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.

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PX1080	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1039	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX4271	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1245	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and business partnerships, which could be used to injure Microsoft if made publicly available.
PX1260	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX4372	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.

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PX4322	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4323	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX4325	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1514	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and business partnerships, which could be used to injure Microsoft if made publicly available.
PX1516	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

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PX1049	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX1050	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1310	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX4351	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1851	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1636	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1486	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1979	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1805	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1177	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1538	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.

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PX1877	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1638	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1154	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1471	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1065	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.
PX4435	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

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PX4419	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making process and business partnerships, which could be used to injure Microsoft if made publicly available.
PX1313	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4329/PX4329A	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX4334	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1391	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

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PX4367	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1624	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX4380	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX1895	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1366	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

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PX1157	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1072	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and business partnerships, which could be used to injure Microsoft if made publicly available.
PX1170	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1425	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4892	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1859	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1025	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1052	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
PX1419	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4057	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1995	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1517	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1890	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1741	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX4336	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1855	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1651	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, market share analyses, and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX1240	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1022	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and internal decision-making processes which could be used to injure Microsoft if made publicly available.
PX4895	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1785	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, revenue figures, projections, and investment decisions which could be used to injure Microsoft if made publicly available.
PX4341	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1563	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1114	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1888	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, market share analyses, and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.

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PX1752	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and market share analyses, which could be used to injure Microsoft if made publicly available.
PX1746	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1750	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1747	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1751	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1904	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and market share analyses, which could be used to injure Microsoft if made publicly available.
PX1905	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and market share analyses, which could be used to injure Microsoft if made publicly available.
PX1854	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4631	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4181	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4154	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
PX1893	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1887	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to Internal decision-making processes which could be used to injure Microsoft if made publicly available.
PX1881	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1896	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4437	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4792	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX4793	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1777	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1865	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX1889	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4578	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX4182	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4588	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX0006	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4897	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4671	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4672	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4893	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX4673	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4894	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4896	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4684	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1182	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.
PX4354	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4260	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and internal decision-making processes which could be used to injure Microsoft if made publicly available.
PX4267	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4670	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and assessment of competitive landscape, which could be used to injure Microsoft if made publicly available.
PX4157	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1767	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX1529	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to investment decision, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4676	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX1188	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making process, which could be used to injure Microsoft if made publicly available.
PX1015	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1019	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX4625	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.
PX1828	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
PX4652	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal decision-making processes, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4624	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX4721	FTC's Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.
Defendants' Exhibit List			
RX1058/RX1258	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX3104	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1060	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1061	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1062	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1064	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1065	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1067	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1074	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1077	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1078	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1079	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.
RX1080	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1082	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.
RX1085	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
RX1086	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX3105	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1088	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4044	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes and business partnerships, which could be used to injure Microsoft if made publicly available.
RX1089	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1090	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX5014	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1093	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1094	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1095	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1096	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
PX4215	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1097	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1098	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1099	Defendants' Exhibit List	Attachment Withheld / Redacted Version of Parent Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1100	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1102	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and strategic evaluation of forward looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1103	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1104	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1105	Defendants' Exhibit List	Attachment Withheld / Redacted Version of Parent Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1106	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
RX1108	Defendants' Exhibit List	Attachment Withheld / Redacted Version of Parent Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1111	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and business partnerships, which could be used to injure Microsoft if made publicly available.
RX1112	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1113	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1142	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1117	Defendants' Exhibit List	Attachment Withheld / Redacted Version of Parent Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1119	Defendants' Exhibit List	Document Withheld / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1121	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1122	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1829	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, investment decisions, which could be used to injure Microsoft if made publicly available.
RX1123	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX5013	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projection, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1125	Defendants' Exhibit List	Parent Document Non-Confidential / Attachment Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations, discussing business strategy, which could be used to injure Microsoft if made publicly available.
RX1128	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1130	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1132	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to investment decisions and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1133	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal discussion of business strategy, which could be used to injure Microsoft if made publicly available.
RX1134	Defendants' Exhibit List	Attachment Withheld / Redacted Version of Parent Document Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1137	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1140	Defendants' Exhibit List	Document Non-Confidential / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1141	Defendants' Exhibit List	Document Non-Confidential / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1116	Defendants' Exhibit List	Document Non-Confidential / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1144	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1146	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1147	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX5011	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1152	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1154	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy and revenue figures and projections and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1155	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, revenue figures and projections, and investment decisions, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1156	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, revenue figures and projections, and investment decisions, which could be used to injure Microsoft if made publicly available.
RX3166/RX5003	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
RX3106	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1161	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1165	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1173	Defendants' Exhibit List	Parent Document Non-Confidential / Attachment Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1175	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1176	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1178	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1181	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX5012	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.
RX3107	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1183	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.
RX1184	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX1774	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy and revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1186	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1187	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1325	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
PX4033	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
PX4028	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1193	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1198	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1200	Defendants' Exhibit List	Document Withheld / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX3019	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1202	Defendants' Exhibit List	Document Withheld / Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1209	Defendants' Exhibit List	Parent Document Non-Confidential / Redacted Version of Attachment Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.
RX1211	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1215	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1217	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1221	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1222	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1321	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX5002	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1223	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.
RX1230	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX3027	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1233	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.
RX1236	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1237	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX5001	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.
RX1238	Defendants' Exhibit List	Parent Document Non-Confidential / Attachment Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreement, which could be used to injure Microsoft if made publicly available.
RX1239	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1241	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1242	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request ¹
RX1243	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1244	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX1245	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
RX3112	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.
PX4238	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1131	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.
RX1174	Defendants' Exhibit List	Document Withheld	This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.

ARGUMENT

I. *In Camera* Treatment of the Exhibits Is Warranted Under Ninth Circuit Precedent as They Contain Microsoft’s Confidential Business Information

The above-mentioned exhibits contain competitively sensitive business information and warrant *in camera* treatment at the evidentiary hearing. In the Ninth Circuit, “[p]arties seeking to seal judicial records relating to motions that are ‘more than tangentially related to the underlying cause of action,’ bear the burden of overcoming the presumption with ‘compelling reasons supported by specific factual findings that outweigh the general history of access and the public policies favoring disclosure.’” *Lenovo (United States) Inc. v. IPCOM GmbH & Co., KG*, 2022 WL 2313948, at *1 (N.D. Cal. Jun. 28, 2022); *see also Kamakana v. City & County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006) (“[T]he court must ‘conscientiously [] balance the competing interests’ of the public and the party who seeks to keep certain judicial records secret.”). Courts in this Circuit regularly find that sealing is warranted where the records or information that are sought to be sealed could be used “as sources of business information that might harm a litigant’s competitive standing.” *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978); *see also In re Elec. Arts, Inc.*, 298 F. App’x 568, 569 (9th Cir. 2008) (same); *Velasco v. Chrysler Grp. LLC*, 2017 WL 445241, at *2 (C.D. Cal. Jan. 30, 2017) (stating that “district courts in this Circuit have sealed records containing ‘information about proprietary business operations, a company’s business mode or agreements with clients,’ [and] ‘internal policies and strategies’”) (internal citations omitted).

“The Ninth Circuit has explained that ‘in general, compelling reasons sufficient to outweigh the public’s interest in disclosure and justify sealing court records exist when such court files might have become a vehicle for improper purposes, such as the use of records to . . . release trade secrets.’” *Velasco*, 2017 WL 445241, at *2 (quoting *Elec. Arts*, 298 F. App’x at 569); *see also Elec. Arts*, 298 F. App’x at 569 (“A ‘trade secret may consist of any formula, pattern, device or compilation of information which is used in one’s business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.’”) (citation omitted). A court has “broad latitude” to grant protective orders to prevent disclosure of “many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information.” *Phillips ex rel. Estates of Byrd v. Gen.*

1 *Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002).

2 In determining whether a document should be filed under seal, courts consider, among other
3 things, the measures taken to guard the information's secrecy and the value of the information to the
4 business or its competitors. *E.g.*, *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206,
5 1212 (9th Cir. 2002). Here, Microsoft seeks *in camera* treatment of only the exhibits on Defendants'
6 and the FTC's exhibit lists that reference and reflect, among other things, confidential, proprietary
7 information relating to Microsoft's internal decision-making processes, investment decisions, strategic
8 evaluation of forward-looking opportunities, market share analyses, assessment of the competitive
9 landscape, business partnerships, terms of existing confidential agreements, revenue figures and
10 projections, and internal presentations discussing business strategy. The disclosure of this information
11 could be used to injure Microsoft if made publicly available.

12 **II. *In Camera* Treatment of the Exhibits Is Necessary to Protect Microsoft's Confidential and**
13 **Proprietary Business Information**

14 Microsoft seeks *in camera* treatment of the above-mentioned exhibits, which contain Microsoft's
15 non-public and highly sensitive information from documents obtained during the course of the FTC's
16 investigation and during litigation discovery. Examples of such confidential information include, but
17 are not limited to, Microsoft's internal decision-making processes, investment decisions, strategic
18 evaluation of forward-looking opportunities, market share analyses, assessment of the competitive
19 landscape, business partnerships, terms of existing confidential agreements, revenue figures and
20 projections, and internal presentations discussing business strategy. Disclosure of this information
21 would provide Microsoft's competitors with private data about Microsoft's performance and business
22 strategy, which could harm Microsoft's competitive standing. *See Cont'l Auto. Sys. v. Avanci, LLC*,
23 2019 WL 6612012, at *4 (N.D. Cal. Dec. 5, 2019). Thus, the unsealing of this highly confidential and
24 sensitive information would cause injury to Microsoft that cannot be avoided through less restrictive
25 alternatives.

26 Finally, Microsoft provided the FTC with confidential business information from the above-
27 mentioned exhibits pursuant to the statutory and regulatory guarantees of confidentiality contained in
28 the Hart-Scott-Rodino Act or the FTC Act. *See* 15 U.S.C. §§ 18a(h), 46(f), 57b-2(b), 57b-2(c); 6 C.F.R.

§ 4.10(d)-(g). In similar cases, the FTC has acknowledged the need to maintain the confidentiality of a party's confidential business information that has been provided to the FTC via a regulatory request. *See, e.g., FTC v. Lockheed Martin Corp.*, 2022 WL 1446650, at *2 (D.D.C. Jan. 25, 2022) ("According to the FTC, sealing the complaint is appropriate . . . because the filing includes confidential information submitted . . . pursuant to 'statutory and regulatory guarantees of confidentiality.' . . . The requested sealing covers only confidential information and is, according to the FTC, required by regulation.").

III. Conclusion

As stated above, compelling reasons justify Microsoft's request for *in camera* treatment of the confidential business information contained in the above-mentioned exhibits. Microsoft therefore respectfully requests that the Court grant this Motion. Redacted and unredacted versions of the Exhibits warranting *in camera* treatment are forthcoming. In accordance with Civil Local Rule 7-11, Microsoft has also filed a Proposed Order herewith.

Dated: June 20, 2023

Respectfully submitted,

By: /s/ Beth Wilkinson

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